

KLEINBERG, KAPLAN, WOLFF &  
COHEN, P.C.  
Matthew J. Gold  
Robert M. Tuchman  
500 Fifth Avenue  
New York, New York 10110  
Tel: (212) 986-6000

*Counsel to the State of Washington*

**UNITED STATES BANKRUPTCY COURT  
SOUTHERN DISTRICT OF NEW YORK**

|                                    |   |                         |
|------------------------------------|---|-------------------------|
| -----                              | x |                         |
| <b>In re:</b>                      | : | Chapter 11              |
|                                    | : |                         |
| <b>PURDUE PHARMA L.P., et al.,</b> | : | Case No. 19-23649 (SHL) |
|                                    | : | (Jointly Administered)  |
| <b>Debtors.</b>                    | : |                         |
|                                    | : |                         |
| -----                              | x |                         |

**EIGHTH MONTHLY FEE STATEMENT OF  
KLEINBERG, KAPLAN, WOLFF & COHEN, P.C. AS COUNSEL TO  
THE STATE OF WASHINGTON FOR COMPENSATION FOR  
SERVICES AND REIMBURSEMENT OF EXPENSES INCURRED  
FOR THE PERIOD OF SEPTEMBER 1, 2022 THROUGH SEPTEMBER 30, 2022**

|  |  |
|--|--|
| <b>Name of Applicant:</b>  | Kleinberg, Kaplan, Wolff & Cohen, P.C.       |
| <b>Provided Professional Services to:</b>  | The State of Washington                      |
| <b>Date of Order Approving Debtors' Payment of Fees and Expenses of Applicant:</b>   | March 10, 2022 [Docket No. 4503]             |
| <b>Period for which compensation and reimbursement are sought:</b>   | September 1, 2022 through September 30, 2022 |
| <b>Amount of Compensation sought as actual, reasonable, and necessary:</b>   | \$107,024.60                                 |
| <b>Current Fee Request</b>   | \$85,619.68 (80% of \$107,024.60)            |
| <b>Amount of Expense Reimbursement sought as actual, reasonable, and necessary:</b>  | \$0  |
| <b>Amount of Compensation and Expenses sought as allowed under the Interim Compensation Order</b>  | \$85,619.68                                  |
| <b>Total Fees and Expenses Inclusive of Holdback</b>   | \$107,024.60                                 |
| <b>This is a(n):</b> <input checked="" type="checkbox"/> Monthly Application <input type="checkbox"/> Interim Application <input type="checkbox"/> Final Application |  |

Pursuant to the *Order Pursuant to 11 U.S.C. §§ 105 and 363(b) Authorizing and Approving Settlement Term Sheet* [Docket No. 4503] (the “Term Sheet Order”), and the *Order Establishing Procedures for Interim Compensation and Reimbursement of Expenses for Retained Professionals*, dated November 21, 2019 [Docket No. 529] (the “Interim Compensation Order”), Kleinberg, Kaplan, Wolff & Cohen, P.C. (“Kleinberg Kaplan”), counsel to the State of Washington in the above-captioned case, and in a related adversary proceeding and appeals, hereby submits this Eighth Monthly Fee Statement (the “Fee Statement”) for the period of September 1, 2022 through and including September 30, 2022 (the “Statement Period”).

**Itemization of Services Rendered and Disbursements Incurred**

Annexed hereto as **Exhibit A** is a chart of the aggregate number of hours expended and fees incurred by professionals and paraprofessionals during the Statement Period, with respect to each of the billing categories. As reflected in Exhibit A, Kleinberg Kaplan incurred \$107,024.60 in fees during the Statement Period. Pursuant to this Fee Statement, Kleinberg Kaplan seeks reimbursement for 80% of such fees, totaling \$85,619.68.

Annexed hereto as **Exhibit B** is a chart of Kleinberg Kaplan's professionals and paraprofessionals, including standard hourly rate for each attorney and paraprofessional who rendered services to the State of Washington and others listed above in connection with these Chapter 11 cases during the Statement Period and the title, hourly rate, aggregate hours worked and the amount of fees earned by each professional. A copy of the computer-generated time entries of Kleinberg Kaplan reflecting all time recorded, organized in the billing categories requested by the State of Washington is attached hereto as **Exhibit C**.

**Notice**

Kleinberg Kaplan will provide notice of the Fee Statement in accordance with the Interim Compensation Order.

Pursuant to the Interim Compensation Order, any party objecting to the payment of interim compensation and reimbursement of expenses as requested shall, within 14 days of service of the Fee Statement, serve via email, to Kleinberg Kaplan and to the notice parties designated in the Interim Compensation Order, a written notice setting forth the precise nature of the objection and the amount at issue.

If an objection is timely served pursuant to the Interim Compensation Order, the Debtors shall be authorized and directed to pay Kleinberg Kaplan an amount equal to 80% of the fees and 100% of the expenses that are not subject to an objection. Any objection must set forth the precise nature of the objection and the amount at issue; it shall not be sufficient to simply object to all fees and expenses.

Dated: November 1, 2022

Respectfully submitted,

KLEINBERG, KAPLAN, WOLFF & COHEN, P.C.

By: /s/ Matthew J. Gold  
Matthew J. Gold  
Robert M. Tuchman

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New York, New York 10110  
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Fax: (212) 986-8866  
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[rtuchman@kkwc.com](mailto:rtuchman@kkwc.com)

*Attorneys for the State of Washington*

**EXHIBIT A**

**SERVICES RENDERED BY**

**KLEINBERG, KAPLAN, WOLFF & COHEN, P.C.**

**COMMENCING SEPTEMBER 1, 2022 THROUGH SEPTEMBER 30, 2022**

**Summary of Fees Task Code**

| <b>Billing Category</b> | <b>Total Hours</b> | <b>Total Fees</b>   |
|-------------------------|--------------------|---------------------|
| 001 Purdue Pharma       | 97.1               | \$102,778.10        |
| 005 Fee Applications    | 6.4                | \$4,246.50          |
| <b>Total</b>            |                    | <b>\$107,024.60</b> |
|                         |                    |                     |
| 20% Fee Holdback        |                    | <b>\$21,404.92</b>  |
| 80% of Fees             |                    | <b>\$85,619.68</b>  |
| Plus Expenses           |                    | <b>\$0</b>          |
| Requested Amount        |                    | <b>\$85,619.68</b>  |

**EXHIBIT B**

**SERVICES RENDERED BY**

**KLEINBERG, KAPLAN, WOLFF & COHEN, P.C.**

**COMMENCING SEPTEMBER 1, 2022 THROUGH SEPTEMBER 30, 2022**

**Summary of Hours and Fees by Professional**

| <b>Name of Professional</b> | <b>Position/Year Admitted to Practice/Department</b> | <b>Hourly Billing Rate</b> | <b>Total Hours Billed</b> | <b>Total Compensation</b> |
|-----------------------------|--|----------------------------|---------------------------|---------------------------|
| Matthew J. Gold             | Partner 1983<br>Bankruptcy                           | \$1,060                    | 77.1                      | \$81,726.00               |
| Robert L. Berman            | Partner 1978<br>Securities and Corporate Finance     | \$1,176                    | 20.6                      | \$24,225.60               |
| Ellie Taylor                | Paralegal<br>Litigation & Risk Management            | \$185                      | 5.8                       | \$1,073.00                |
| <b>Total Fees Requested</b> |  |                            |                           | <b>\$107,024.60</b>       |

**EXHIBIT C**

**Time Entries for Each Professional by Task Code (Invoices)**

Kleinberg Kaplan Wolff & Cohen P.C.  
500 Fifth Avenue  
New York, NY 10110

State of Washington  
SAAG Administrator  
Email: SAAG@atg.wa.gov  
cc: Washington State Attorney General's Office  
Complex Litigation Division  
800 Fifth Avenue, Suite 2000  
Seattle, WA 98104

Invoice Date: October 31, 2022  
Invoice Number: 115249  
Matter Number: 7263-0001

Client: State of Washington  
Matter: Purdue Pharma

*For professional services rendered through September 30, 2022*

Currency: USD

Fees 102,778.10

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|                         |                     |
|-------------------------|---------------------|
| <b>Total Amount Due</b> | <b>\$102,778.10</b> |
|-------------------------|---------------------|

|                         |  |   |
|-------------------------|--|---|
| <b>Please Remit to:</b> | <b>Mail To:</b><br>Kleinberg, Kaplan, Wolff &<br>Cohen, P.C.<br>500 Fifth Avenue<br>New York, N.Y. 10110 | <b>Wire Instructions:</b><br>Citibank N.A.<br>ABA Number: 021000089<br>Swift Code: CITIUS33 (International)<br>Account # 9987286692<br><b>(Please Reference Invoice Number)</b> |
|-------------------------|--|---|



Client: State of Washington  
Matter: Purdue Pharma

Invoice Date: October 31, 2022  
Invoice Number: 115249  
Matter Number: 7263-0001

**Time Detail**

| <u>Date</u> | <u>Name</u>     | <u>Description</u>  | <u>Hours</u> | <u>Rate</u> | <u>Amount</u> |
|-------------|-----------------|---|--------------|-------------|---------------|
| 09/01/2022  | Matthew J. Gold | Conferring regarding intercreditor agreement; participating in conference call with team regarding same; reviewing same           | 4.30         | 1,060.00    | 4,558.00      |
| 09/01/2022  | Robert Berman   | Conferring regarding Intercreditor Agreement and preparing for working group call; working group call                             | 3.30         | 1,176.00    | 3,880.80      |
| 09/02/2022  | Matthew J. Gold | Revising outline regarding intercreditor agreement; reviewing same  | 3.30         | 1,060.00    | 3,498.00      |
| 09/06/2022  | Matthew J. Gold | Revising outline regarding intercreditor agreement; reviewing same  | 2.70         | 1,060.00    | 2,862.00      |
| 09/07/2022  | Matthew J. Gold | Revising outline regarding intercreditor agreement; reviewing same; conferring regarding same                                     | 2.10         | 1,060.00    | 2,226.00      |
| 09/07/2022  | Robert Berman   | Conferring regarding next steps and open issues   | 0.40         | 1,176.00    | 470.40        |
| 09/08/2022  | Matthew J. Gold | Revising outline regarding intercreditor agreement; reviewing same  | 3.70         | 1,060.00    | 3,922.00      |
| 09/08/2022  | Robert Berman   | Conferring  | 0.20         | 1,176.00    | 235.20        |
| 09/09/2022  | Matthew J. Gold | Revising outline regarding intercreditor agreement; preparing email regarding same  | 4.10         | 1,060.00    | 4,346.00      |
| 09/09/2022  | Robert Berman   | Reviewing and thinking about issue list; conferring   | 1.40         | 1,176.00    | 1,646.40      |
| 09/12/2022  | Matthew J. Gold | Revising email and attachment regarding intercreditor agreement   | 2.40         | 1,060.00    | 2,544.00      |
| 09/12/2022  | Robert Berman   | Responding to issue list and conferring   | 1.30         | 1,176.00    | 1,528.80      |
| 09/13/2022  | Matthew J. Gold | Revising and circulating outline regarding intercreditor agreement; exchanging emails with team regarding meeting to discuss same | 1.80         | 1,060.00    | 1,908.00      |
| 09/13/2022  | Robert Berman   | Reviewing emails; conferring  | 0.60         | 1,176.00    | 705.60        |
| 09/14/2022  | Matthew J. Gold | Revising outline regarding intercreditor agreement  | 0.80         | 1,060.00    | 848.00        |
| 09/14/2022  | Robert Berman   | Conferring and considering issues   | 0.90         | 1,176.00    | 1,058.40      |

Client: State of Washington  
Matter: Purdue Pharma

Invoice Date: October 31, 2022  
Invoice Number: 115249  
Matter Number: 7263-0001

| <u>Date</u> | <u>Name</u>     | <u>Description</u>  | <u>Hours</u> | <u>Rate</u> | <u>Amount</u> |
|-------------|-----------------|---|--------------|-------------|---------------|
| 09/15/2022  | Matthew J. Gold | Revising outline regarding intercreditor agreement  | 1.30         | 1,060.00    | 1,378.00      |
| 09/15/2022  | Robert Berman   | Conferring  | 0.60         | 1,176.00    | 705.60        |
| 09/16/2022  | Matthew J. Gold | Revising outline regarding intercreditor agreement  | 1.60         | 1,060.00    | 1,696.00      |
| 09/19/2022  | Matthew J. Gold | Reviewing Intercreditor Agreement outline; participating in conference call with team regarding same; exchanging emails with team regarding same; conferring regarding same | 4.80         | 1,060.00    | 5,088.00      |
| 09/19/2022  | Robert Berman   | Working group call regarding Intercreditor agreement; conferring regarding next steps   | 2.60         | 1,176.00    | 3,057.60      |
| 09/20/2022  | Matthew J. Gold | Preparing comments and edits for Intercreditor Agreement  | 4.60         | 1,060.00    | 4,876.00      |
| 09/20/2022  | Robert Berman   | Reviewing emails and conferring   | 1.50         | 1,176.00    | 1,764.00      |
| 09/21/2022  | Ellie Taylor    | Reviewing potential omnibus hearing   | 0.40         | 185.00      | 74.00         |
| 09/21/2022  | Matthew J. Gold | Reviewing intercreditor agreement; conferring regarding same  | 5.30         | 1,060.00    | 5,618.00      |
| 09/21/2022  | Robert Berman   | Begin marking - up Collateral Trust Agreement and conferring  | 1.70         | 1,176.00    | 1,999.20      |
| 09/22/2022  | Matthew J. Gold | Reviewing intercreditor agreement; conferring regarding same and document review  | 5.60         | 1,060.00    | 5,936.00      |
| 09/22/2022  | Robert Berman   | Conferring regarding Intercreditor Agreement  | 0.20         | 1,176.00    | 235.20        |
| 09/22/2022  | Ellie Taylor    | Reviewing background and status of case in detail as part of paralegal turnover; reviewing relevant docket materials  | 2.50         | 185.00      | 462.50        |
| 09/23/2022  | Matthew J. Gold | Reviewing intercreditor agreement; conferring regarding same; revising outline regarding same   | 5.40         | 1,060.00    | 5,724.00      |
| 09/23/2022  | Robert Berman   | Marking up Collateral Trust Agreement and conferring  | 1.70         | 1,176.00    | 1,999.20      |
| 09/27/2022  | Matthew J. Gold | Reviewing intercreditor agreement; preparing email regarding same   | 5.70         | 1,060.00    | 6,042.00      |

Client: State of Washington  
Matter: Purdue Pharma

Invoice Date: October 31, 2022  
Invoice Number: 115249  
Matter Number: 7263-0001

| <u>Date</u>  | <u>Name</u>     | <u>Description</u>   | <u>Hours</u> | <u>Rate</u> | <u>Amount</u>       |
|--------------|-----------------|--|--------------|-------------|---------------------|
| 09/28/2022   | Matthew J. Gold | Reviewing intercreditor agreement; revising outline regarding same; reviewing draft motion concerning NCSG fees; exchanging emails with J. Rupert regarding same | 4.80         | 1,060.00    | 5,088.00            |
| 09/28/2022   | Robert Berman   | Working on Intercreditor agreement   | 1.70         | 1,176.00    | 1,999.20            |
| 09/29/2022   | Matthew J. Gold | Reviewing and revising intercreditor agreement; revising outline regarding same  | 4.70         | 1,060.00    | 4,982.00            |
| 09/29/2022   | Robert Berman   | Reviewing changes to Intercreditor agreement   | 0.40         | 1,176.00    | 470.40              |
| 09/30/2022   | Matthew J. Gold | Reviewing and revising intercreditor agreement; revising outline regarding same; exchanging emails regarding same  | 4.60         | 1,060.00    | 4,876.00            |
| 09/30/2022   | Robert Berman   | Marking up the intercreditor agreement and conferring  | 2.10         | 1,176.00    | 2,469.60            |
| <b>Total</b> |                 |  | <b>97.10</b> |             | <b>\$102,778.10</b> |

#### Timekeeper Summary

| <u>Name</u>     | <u>Hours</u> | <u>Rate</u> | <u>Amount</u>       |
|-----------------|--------------|-------------|---------------------|
| Ellie Taylor    | 2.90         | 185.00      | 536.50              |
| Matthew J. Gold | 73.60        | 1,060.00    | 78,016.00           |
| Robert Berman   | 20.60        | 1,176.00    | 24,225.60           |
| <b>Total</b>    | <b>97.10</b> |             | <b>\$102,778.10</b> |

Kleinberg Kaplan Wolff & Cohen P.C.  
500 Fifth Avenue  
New York, NY 10110

State of Washington  
SAAG Administrator  
Email: SAAG@atg.wa.gov  
cc: Washington State Attorney General's Office  
Complex Litigation Division  
800 Fifth Avenue, Suite 2000  
Seattle, WA 98104

Invoice Date: October 31, 2022  
Invoice Number: 115250  
Matter Number: 7263-0005

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Client: State of Washington  
Matter: Fee applications

*For professional services rendered through September 30, 2022*

Currency: USD

Fees 4,246.50

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|                         |                   |
|-------------------------|-------------------|
| <b>Total Amount Due</b> | <b>\$4,246.50</b> |
|-------------------------|-------------------|

|                         |  |  |
|-------------------------|--|--|
| <b>Please Remit to:</b> | <b>Mail To:</b><br>Kleinberg, Kaplan, Wolff &<br>Cohen, P.C.<br>500 Fifth Avenue<br>New York, N.Y. 10110 | <b>Wire Instructions:</b><br>Citibank N.A.<br>ABA Number: 021000089<br>Swift Code: CITIUS33 (International)<br>Account # 9987286692<br>(Please Reference Invoice Number) |
|-------------------------|--|--|

Client: State of Washington  
Matter: Fee applications

Invoice Date: October 31, 2022  
Invoice Number: 115250  
Matter Number: 7263-0005

#### Time Detail

| <u>Date</u>  | <u>Name</u>     | <u>Description</u>  | <u>Hours</u> | <u>Rate</u> | <u>Amount</u>     |
|--------------|-----------------|---|--------------|-------------|-------------------|
| 09/06/2022   | Ellie Taylor    | Preparing communication in regards to Sixth Monthly Fee Statement                   | 0.20         | 185.00      | 37.00             |
| 09/12/2022   | Matthew J. Gold | Exchanging emails with C. Macdonald regarding reimbursement                         | 0.30         | 1,060.00    | 318.00            |
| 09/13/2022   | Ellie Taylor    | Coordinating internal tracking system for communications regarding Fee Applications | 0.40         | 185.00      | 74.00             |
| 09/14/2022   | Matthew J. Gold | Conferring and exchanging emails regarding status of reimbursement                  | 0.30         | 1,060.00    | 318.00            |
| 09/14/2022   | Ellie Taylor    | Populating internal communication tracker   | 0.30         | 185.00      | 55.50             |
| 09/15/2022   | Matthew J. Gold | Reviewing time records for reimbursement  | 1.40         | 1,060.00    | 1,484.00          |
| 09/20/2022   | Matthew J. Gold | Reviewing statement of reimbursement amount; exchanging emails regarding same       | 0.80         | 1,060.00    | 848.00            |
| 09/23/2022   | Matthew J. Gold | Finalizing statement backup for reimbursement                                       | 0.30         | 1,060.00    | 318.00            |
| 09/23/2022   | Ellie Taylor    | Drafting Seventh Monthly Fee Statement  | 1.30         | 185.00      | 240.50            |
| 09/27/2022   | Matthew J. Gold | Reviewing monthly statement; exchanging emails regarding same                       | 0.40         | 1,060.00    | 424.00            |
| 09/27/2022   | Ellie Taylor    | Updating, filing, and circulating Seventh Monthly Fee Statement                     | 0.70         | 185.00      | 129.50            |
| <b>Total</b> |                 |   | <b>6.40</b>  |             | <b>\$4,246.50</b> |

#### Timekeeper Summary

| <u>Name</u>     | <u>Hours</u> | <u>Rate</u> | <u>Amount</u>     |
|-----------------|--------------|-------------|-------------------|
| Ellie Taylor    | 2.90         | 185.00      | 536.50            |
| Matthew J. Gold | 3.50         | 1,060.00    | 3,710.00          |
| <b>Total</b>    | <b>6.40</b>  |             | <b>\$4,246.50</b> |